

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

**CHARLES BERNSTEIN, JR.,
Individually and on Behalf of
All Others Similarly Situated,**

Plaintiff,

v.

BUCKEYE, INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§
§

CASE NO. 7:18-CV-00097-DC

DEFENDANT'S PROPOSED VOIR DIRE

Pursuant to Local Rule 16(e)(1), Defendant Buckeye, Inc. submits its proposed voir dire questions:

1. Do you know Mr. Charles Bernstein Jr., Burnice Pickens, or Roland Morgan, or anyone in their family? All three individuals are mud engineers.
2. Do you know William S. Hommel, Jr. or anyone who works with him at the Hommel Law Firm? It is located in Tyler, Texas but handles cases in other cities. Has Mr. Hommel or anyone at the Hommel Law Firm ever represented you or any of your family or friends?
3. Have you ever worked at Buckeye, Inc. before? If so, what was your position? Why did your employment end? Where did you work and what was your position?
4. Do you know anyone who is working at Buckeye, Inc. at this time? Do you know anyone who has ever worked at Buckeye, Inc., even if they are no longer there?
5. Do you know Chan Price, Thad Robinson, Adam Jones, Taylor Stenson, or Alex Gonzalez? These individuals work at Buckeye or used to work at Buckeye.
6. Have you ever worked in the oilfield industry, now or in the past? What do you do? Where do you work? Who do you work for?
7. Do you have any negative feelings about Buckeye or the oilfield industry? If so, why do you have those feelings and will those negative feelings impact the way you view the case and weigh the evidence?

8. Have you or any member of your family or a close friend ever filed a lawsuit or claim regarding unpaid overtime wages? Please describe what occurred. Does that experience impact the way you view the case and weigh the evidence?
9. Do you have any relatives or close friends who are lawyers or employed in the legal profession?

Respectfully submitted,

KEMP SMITH LLP
P.O. Box 2800
El Paso, Texas 79999-2800
(915) 533-4424
(915) 546-5360 (FAX)

By: /s/ Clara B. Burns
CLARA B. BURNS
State Bar No. 03443600
Clara.Burns@kempsmith.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for Plaintiff, William S. Hommel, Jr., Hommel Law Firm, 1404 Rice Road, Suite 200, Tyler, Texas 75701, bhommell@hommelfirm.com.

/s/ Clara B. Burns
CLARA B. BURNS